



March 2, 1982

Mr. John Downes, Manager
Engineering and Technical Service
LCP Chemicals - N.J. Inc.
P.O. Box 484
Linden, New Jersey 07036

Dear Mr. Downes:

In reviewing the engineering drawing Section "A-A" submitted with your DPCC/DCR Plan which shows the proposed diking of the three (3) elevated 20,000 gallon HCl storage tanks, it appears that the dikes would be effective only in the case of a small leak or rupture along the base of the tank. In view of the limited space available due to the proximity of the railroad tracks, LCP Chemicals would need to assure the Division of adequate containment by increasing the dike height to prevent contamination of ground water from a side rupture or provide an adequate diversion-neutralization system in addition to the proposed dike. This Division cannot dictate how a facility is to meet the Department's regulations, and it is up to each company to propose their plans for compliance; however, as a suggestion you might address the permeability of the earthen soils in the area around the tanks or pave and grade the area to slope to a trench system. In addition or as an alternative, provision of a three (3) or four (4) inch limestone layer over the area that would be covered in the event of a complete release of the contents of any one tank might provide adequate neutralization and thus, prevention of ground water contamination.

If LCP Chemicals maintains that the submitted upgrading plan provides the best practicable means of meeting the secondary containment requirement of the New Jersey State regulations, then submit a brief statement in your upcoming response to the Division attesting to the reasons why this diking proposal is most feasible.

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In accordance with N.J.A.C. 7:1E-4(b), the additional information shall be submitted within thirty (30) days of receipt of this letter. Failure to submit the requested information may result in denial of the Plan without prejudice to resubmission.

If you have any questions regarding this matter, please contact me at the above address or call (609) 292-5560.

Sincerely,

James R. Plummer
Bureau of Prevention and Planning

JRP:cb

cc Keith Onsdorff